

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24-CV-81355-RLR

JANIE DOE, a minor child, by and through  
M.B. and S.B., her Parents and Natural Guardians,  
and Individually,

Plaintiffs,

v.

PALM BEACH COUNTY SCHOOL BOARD a/k/a  
SCHOOL DISTRICT OF PALM BEACH COUNTY,  
and DAX RANKINE, Individually,

Defendants.

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**DEFENDANT, DAX RANKIN'S MOTION FOR EXTENSION OF TIME TO FILE A  
RESPONSE TO PLAINTIFF'S COMPLAINT**

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COMES NOW, the Defendant, DAX RANKINE, by and through his undersigned counsel and pursuant to Rule 7.1 of the Local Rules of the Southern District of Florida hereby files this Motion for Extension of Time to File a Response to Plaintiff's Complaint and in support thereof would state as follows:

1. That on October 30, 2024 the Plaintiff filed an Eight count Complaint [DE1], with two of those counts filed against the Defendant, Dax Rankine.
2. That the Defendant, DAX RANKINE was served with the aforementioned Complaint on or about November 6, 2024.
3. That a formal response to the Plaintiff's Complaint by the Defendant is due on or before November 26, 2024.
4. The undersigned's firm was recently retained to represent Mr. Rankine and a Notice of Appearance has been filed on behalf of the Defendant on November 20, 2024. [DE6].

5. That as a result of recently being retained by the Defendant, the nature of the claims filed against Mr. Rankine and a preplanned vacation during the Thanksgiving holidays, the undersigned would request an extension of time of twenty (20) days to file a responsive pleading.

6. The undersigned does not file this Motion for the purpose of delay nor any other dilatory purpose.

7. That the undersigned has contacted counsel for the Plaintiff who has indicated that the Plaintiff has no objection to the Defendant's requested relief.

8. WHEREFORE, the undersigned respectfully request this Honorable Court grant an extension of time of twenty (20) days until December 16, 2024 in which to serve a response to Plaintiff's Complaint.

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Attorney for Defendant, Dax Rankine

/s/Charles D. Thomas  
Charles D. Thomas, Esq.  
Florida Bar No.: 190896

**Certificate of Service**

It is hereby certified that on the 25th day of November, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specific, either via transmission of Notice of Electronic filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic filing.

s/ Charles D. Thomas  
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